

CHEMICAL PROCESSORS, INC.

5501 AIRPORT WAY SO.
SEATTLE, WASHINGTON 98108

PHONE: (206) 767-0350

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WASTE MANAGEMENT BRANCH

October 2, 1985

Mr. Laurence Ashley
Washington State Department of Ecology
4350 150th NE
Redmond, Washington 98052

Dear Mr. Ashley:

I am enclosing Chemical Processors, Inc. updated
Closure Plans for our three facilities located at
Pier 91, Georgetown and Tacoma.

If you have any questions please do not hesitate to
call.

Sincerely,

A. Jeanne Van Wallendael
A. Jeanne Van Wallendael
Compliance Officer

AJV:lat

Enclosures

cc: Andrew Boyd
Environmental Protection Agency

USEPA RCRA



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CHEMICAL PROCESSORS, INC.

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SEATTLE, WASHINGTON 98108

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PIER 91 CLOSURE PLAN

GENERAL INFORMATION

The Pier 91 Facility was formerly a U.S. Naval facility and is located on Puget Sound's northern waterfront adjacent to Elliott Bay.

The Pier 91 facility is located within approximately one quarter mile of Smith Cove and Smith Cove Waterway both part of Elliott Bay. Pier 91 is completely surrounded by Port of Seattle property. There are only outlying residential areas from the plant site.

Pier 91 has been developed into a prominent marine recycling terminal for large quantities of bilges and ballasts waters, both industrial and hazard classes, along with oil treating and recovery. The facility also serves as interim storage for reprocessed material that can be shipped either via truck, rail or barge. In addition, a portion of this 8,000,000 gallon complex is leased as a marine fuel depot by Pacific Northern Oil Company.

Pier 91's main function is waste oil reclamation. The maximum capacity of Chemical Processors operations at Pier 91 is 3.5 million gallons. Waste oil is rendered reusable by tank treatments such as separation of impurities and breaking emulsions. All the processed oil is currently sold to Pacific Northern oil Co. as cutting stock in marine oils. Pier 91 also treats liquid wastes contaminated with low level heavy metals and/or other low concentration hazardous wastes which can be treated to render the liquids non-hazardous.

The operation currently involves 6 to 10 employees operating through two shifts five days per week. This varies according to market conditions.

The waste is delivered to Pier 91 in tanker trucks and pumped into the tanks according to the site piping layout. This layout includes the loading area for transportation of materials off-site (see attached).

Storm or rain water suitable for discharge to Metro sewer system is collected by drains connected to the catchment basin. Storm waters are processed through the oil/water separator and then discharged directly to Metro sewers. An oil/water photocell monitoring device sounds an alarm if permitted levels of oil are exceeded.

Industrial wastewater leaving the plant is collected and treated on a batch basis. The batch container is sampled after each treatment, the samples are composited and analyzed for applicable pollutants.

The Pier 91 facility only discharges water which is within the limits of its Metro discharge permit.

The facility is required to have an Emergency Preparedness, Prevention and Contingency Plan, and a Spill, Prevention, Control and Countermeasures Plan. These plans were updated in 1984.

A closure cost estimate is attached. The closure cost estimate includes costs for a sampling procedure and analysis plan, if deemed necessary at the time of closing.

DECONTAMINATION OF THE FACILITY

The Pier 91 facility is monitored by multiple control procedures. There is a detailed waste analysis plan to control waste coming into the site. All the run-off water is collected, tested and treated (if necessary) prior to discharge. A discharge analysis is performed every month to insure all discharge waters meet the Metro discharge limits in the permit. These parameters allow accurate monitoring of site conditions, and insure the integrity of the site.

PIER 91 FACILITY CLOSURE COST ESTIMATE

FACILITY LOCATION: Pier 91
Seattle, WA 98119

DATE: 9-29-85

EPA I.D. NUMBER: WAD000812917

<u>Treatment</u>	<u>Quantity</u>	<u>Cost/Unit</u>	<u>Cost</u>
Emulsified Oil	19,100 Gal	\$0.10/Gal	\$ 1,910.00
Oil/Water Sludge Separator	48,758	\$2.10/Gal	\$102,385.00
 <u>Disposal</u>			
Sludge	8,667 Bbls	\$24.75/Bbl	<u>\$214,508.25</u>
		Subtotal	\$318,803.25
 <u>Reclamation</u>			
Oil	12,025 Bbls	\$21.84/Bbl	<<\$262,626.00>>
<<Disposal & Treatment Costs Minus Net Reclamation Sales>>		NET COST	\$56,177.25

General Clean-Up*

	9 Tanks	\$500.00 each	\$4,500.00
	4 Tanks	\$250.00 each	\$1,000.00
	5 Tanks	\$1,000.00 each	\$5,000.00
	2 Tanks	\$2,500.00 each	<u>\$5,000.00</u>
		SUBTOTAL	\$15,500.00
 <u>Labor</u>	<u>Quantity</u>	<u>Cost/Unit</u>	<u>Cost</u>
Cleanup	808 Manhours	\$11.00/Hour	\$8,888.00
Processing	1,625 Manhours	\$11.00/Hour	<u>\$17,875.00</u>
		Subtotal	\$26,763.00
Sampling Procedure & Analysis Plan			\$23,000.00
Professional Engineering Certification			<u>\$ 1,000.00</u>
		Subtotal	\$122,440.25
		Contingency at 10%	<u>\$ 12,244.03</u>
		Total	\$134,684.28

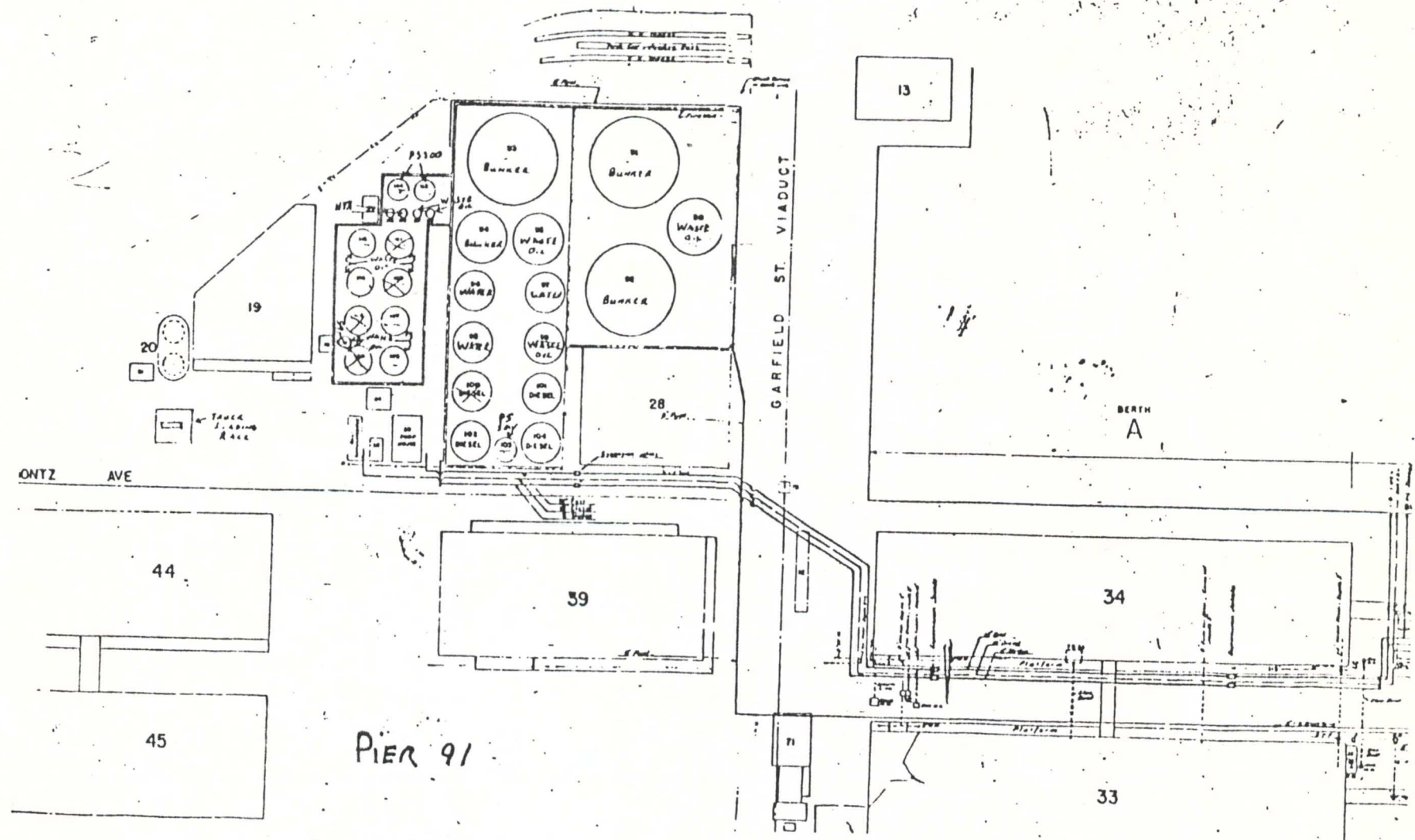
*Includes equipment rental necessary for clean-up operations.

SUMMARY

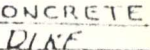
Since it is the intent of Chemical Processors, Inc. to operate the Pier 91 facility on a perpetual life basis, in that the processes and activities performed in this facility are of a nature that does not create an "end-life" to said facility, this closure plan is submitted with no fixed closure date. However, in the event that this facility should require closure, such action would be conducted in the following manner.

- 1) All materials on site shall be shipped to either a disposal facility or another reprocessing facility for disposition, utilizing the proper manifesting procedures required by RCRA and WAC 173-303.
- 2) Any hazardous residues remaining in the tanks shall be rinsed from the tanks and the rinsed material shall be disposed of in accordance with the applicable regulations.
- 3) The facility itself shall be converted to an alternate economic use.
- 4) Six months prior to closure, a definitive schedule would be submitted to the regional administrator as outlined in CFR 265.112(d).
- 5) One month prior to this date, the closure plan will be updated as to:
 - a) Scope of closure work
 - b) Contractor
 - c) Schedule with dates anticipated for phases of closure
 - d) Updated cost estimates for closure
 - e) If deemed necessary, a complete sampling procedure and analysis plan

FIGURE 1
GENERAL SITE LAYOUT



NOTE: TANKS shown ON MAP, but NOT
listed ON schedule ARE LEASED
to others.



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